

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
AT CINCINNATI**

Matthew Rankin, by and through his	:	Case No: 1:21-cv-606
guardian ad litem, Elizabeth Antrobus,	:	
	:	
Plaintiff,	:	Judge: Michael R. Barrett
	:	
v.	:	
	:	JOINT MOTION FOR EXTENSION OF
Resurgent Capital Services, L.P., et al.,	:	CURRENT CASE SCHEDULE
	:	
Defendants.	:	

Now come all parties, by counsel, and respectfully request that this Court grant a 60-day extension of the current dates set by Order (ECF 21). Specifically, the parties request the following modification:

	Current Dates	Requested New Date
Discovery closes	1/1/2023	3/1/2023
Dispositive motions	3/1/2023	5/1/2023
Settlement Conf.	4/12/2023	6/2023
Final Pretrial Conf.	8/1/2023	10/2023
Trial	10/2023	12/2023

This extension will enable the parties to conduct necessary discovery which is on-going. Plaintiff's deposition had been rescheduled for December 12, 2022, but Plaintiff fell ill and was unable to attend his deposition. The parties have rescheduled Plaintiff's deposition for January 11, 2023. Defendant Credit Control, LLC's corporate deposition took place on December 6, 2022. The parties are attempting to negotiate a date for Bruce Rankin's deposition. The corporate depositions of LVNV Funding, LLC and Resurgent Capital Services, LP were scheduled for December 8, 2022, but had to be rescheduled to

January 6, 2023, due to a conflict on the part of Defendants' corporate designee. The parties are still also working to informally resolve discovery related to the production of documents and subpoena issued to Bruce Rankin.

The parties have diligently worked to complete necessary discovery and will continue to use their best efforts to cooperate in discovery. Nonetheless, the parties need additional time to complete discovery. For these reasons, the parties request a 60-day extension of the current dates.

Respectfully submitted,

/s/Amy Wells, per email authority
AMY L. WELLS, Ohio No. 78247
Counsel for Plaintiff
244 East Pearson St., #1008
Chicago, IL 60611
Tel. 773.762.9104
amywells@equaljusticelaw.com

/s/Boyd W. Gentry
Boyd W. Gentry (0071057)
Zachary P. Elliott (0090057)
Law Office of Boyd W. Gentry, LLC
4031 Colonel Glenn Highway, First Floor
Beavercreek, OH 45431
Tel. (937) 839-2881
Fax (800) 839-5843
bgentry@boydgentrylaw.com
zelliott@boydgentrylaw.com
*Counsel for Resurgent Capital Services, L.P.,
Credit Control, LLC, and LVNV Funding, LLC*

Certificate of Service

I certify that the foregoing has been served by the Court's CM/ECF service to all counsel of record on December 28, 2022.

/s/Boyd W. Gentry
Boyd W. Gentry (0071057)